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MARY ELLEN DUNLAP
CLERK OF SUPERIOR COURT

BY _____
DEPUTY

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8 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
9 IN AND FOR THE COUNTY OF COCHISE

10 THE STATE OF ARIZONA,
11 *Plaintiff,*

12 v.

13 DAVID ALAN HUNT,
14 WILLIAM CLARK CONROY,
15 JR.,
16 JONATHAN BYRON WRIGHT,
17 JA'MON DARRELL CURRY,
18 *Defendants,.*

No. S0200 CR 2018 00725	[X]
No. S0200 CR 2018 00726	[]
No. S0200 CR 2018 00727	[]
No. S0200 CR 2018 00728	[]

STATE'S DISCLOSURE
NOTICE PURSUANT TO
ARIZ. R. CRIM. P. 15.1(c)(1)

Assigned to the Hon. Wallace R. Hoggatt
Division 3

19
20 Pursuant to Ariz. R. Crim. P. 15.1(c)(1), the State of Arizona provides
21 the following disclosure information:
22

23 I. Rule 15.1(b)(1) - Witnesses:

- 24 1) Special Agent Louis Szilagyi, Arizona Department of Gaming (ADOG),
25 1110 West Washington Street, Suite 450, Phoenix, Arizona 85007
26 2) Shawn Shahsavari, ADOG

- 1 3) SA Glenn Mucci, ADOG
- 2 4) Lt. Darren Baldwin, ADOG
- 3 5) SA Andrew Gomez, ADOG
- 4 6) Lt. Doug Jensen, ADOG
- 5 7) SA D. Valencia, ADOG
- 6 8) SA T. Staten, ADOG
- 7 9) Daniel Abrams, Sun N Spokes, 156 Fry Boulevard, Sierra Vista,
- 8 Arizona
- 9 10) Defendant David Alan Hunt, c/o Joseph P. DiRoberto, Esq.
- 10 11) Defendant William Clark Conroy, Jr., c/o Joseph P. DiRoberto, Esq.
- 11 12) Jonathan Byron Wright, c/o David Thomas Wilkison, Esq.
- 12 13) Ja'Mon Darrell Curry, c/o Sara Xochitl Orozco, Esq.
- 13 14) Any person listed on any Defense disclosure statement.

14
15 In lieu of calling a custodian of records, the State hereby provides notice that
16 it intends to introduce business records through certificate(s) as provided in
17 Ariz. R. Evid. 902(11) and Ariz. R. Evid. 803(6). As a part of the discovery
18 process, copies of the certificate(s) and the records described therein have
19 been provided for the Defendant's inspection for:

- 20 • Cox Communications
- 21 • Wells Fargo Bank
- 22 • Southwest Gas

23
24 **II. Rule 15.1(b)(1) - Victims:**

- 25 1) The State of Arizona
- 26

1 **III. Rule 15.1(b)(2) – Statements of the Defendant:**

2 All Statements of the Defendant were provided to the Defendant as a
3 part of the State's initial discovery materials provided to defense counsel (see
4 part IV, below).

5
6 **IV. Rule 15.1(b)(3) - Reports:**

7 The State disclosed all reports (containing Bates numbers up to
8 AG005511) by providing them to the Defendant's counsel via electronic
9 download. No additional materials have been received since the last
10 Defendant's arraignment on September 25, 2018.

11
12 **V. Rule 15.1(b)(4) - Experts:**

13 The State has not retained any experts at this time. If an expert is
14 retained, or if the State elects to qualify one of the listed witnesses as an
15 expert witness, the State will supplement this Notice pursuant to the Rules
16 of Criminal Procedure.

17
18 **VI. Rule 15.1(b)(5) - Documentary Evidence:**

19 The State intends to use the following documents and/or tangible
20 objects at trial:

- 21 1) Records from the Arizona Corporation Commission showing the
22 organization and operation of Arizona Card Room LLC and Arizona
23 Card Room – Sierra Vista LLC.
- 24 2) License records from the City of Sierra Vista for "Arizona Card Room,
25 Inc."
- 26 3) Items seized during a search of The Poker Room Live on September

1 14, 2017, including but not limited to cards and poker equipment,
2 player IOU forms and borrowing records, an employee work schedule,
3 and tax returns.

- 4 4) Financial records of The Poker Room Live, including records stored in
5 QuickBooks.
- 6 5) A web page purporting to advertise The Poker Room Live.
- 7 6) Bank records for The Poker Room Live provided by Wells Fargo Bank.
- 8 7) Documentation showing the intake of funds by The Poker Room Live,
9 including but not limited to cash seized from the location on
10 September 14, 2017, bank records, and membership applications.
- 11 8) Documentation showing the expenditure of funds by The Poker Room
12 Live, including but not limited to bank records, a property lease and
13 payment records, and account records from Cox Communications and
14 Southwest Gas.
- 15 9) Wage reports filed on behalf of The Poker Room Live to the
16 Department of Economic Security.
- 17 10) Video and audio recorded during surveillance conducted at The Poker
18 Room Live.
- 19 11) Video and audio recorded during visits by undercover officers to The
20 Poker Room Live.
- 21 12) Recorded interviews of the Defendants.
- 22 13) Any other record which assists in the determination of the identity or
23 residency of a Defendant.
- 24 14) Any other document, item, or thing mentioned in ADOG report
25 20170815-444 including any case-related documents, items, or things
26 maintained in the possession of any law enforcement agent listed

1 above.

2 15) Any item listed on any Defendant's disclosure.

3 16) Any summary or analysis of any of the above items.

4 17) Any reports given, written, or previously disclosed.

5
6 **VII. Rule 15.1(b)(6) - Prior Felony Convictions:**

7 The State is not aware of any prior felony convictions of any Defendant.

8
9 **VIII. Rule 15.1(b)(7) - Prior Acts:**

10 The State is not aware of any "prior bad acts" testimony that it would
11 use at trial, but reserves the right to use such testimony with proper notice to
12 the parties.

13
14 **IX. Rule 15.1(b)(8) - Mitigating Information or Circumstances:**

15 To avoid making an arbitrary determination of what information or
16 material would mitigate or negate the Defendant's guilt as to the offenses
17 charged, the State will make its evidence file available for inspection and
18 copying during regular working hours, with reasonable prior notice.

19
20 **X. Rule 15.1(b) (9) - Electronic Surveillance:**

21 This case does not involve electronic surveillance.

22
23 **XI. Rule 15.1(b) (10) - Search Warrants:**

24 A copy of all materials related to search warrant SW 2017-015030,
25 issued by Maricopa County Superior Court Judge Greg Como on September
26 12, 2017, including warrants, affidavits, inventories, and related

1 documentation, was provided to the Defendant as a part of the State's initial
2 discovery materials.

3
4 **XII. Rule 15.1(b) (11) - Confidential Informants:**

5 This case does not involve confidential informants.

6
7 RESPECTFULLY SUBMITTED this 19th day of December, 2018.

8 MARK BRNOVICH
9 ATTORNEY GENERAL

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11 TODD C. LAWSON
12 Assistant Attorney General
13 Criminal Division
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